Message

From: Weiss, Michael [weiss.michael@epa.gov]

Sent: 4/1/2020 11:56:04 PM **To**: Jay Rao [JRao@dcorllc.com]

CC: Magnan, Eric [Magnan.Eric@epa.gov]; Howell, Adam [Howell.Adam@epa.gov]

Subject: RE: Follow-up to Platform Edith Inspection

Hi Jay,

Hope all is well. I was wondering if you had an update on what DCOR is considering for sampling the commingled deck drainage and produced water?

Thanks and stay safe,

Mike

From: Jay Rao <JRao@dcorllc.com>
Sent: Sunday, March 01, 2020 8:31 PM

To: WEISS, MICHAEL < weiss.michael@epa.gov>
Subject: Re: Follow-up to Platform Edith Inspection

Hi Mike,

Sorry for the delay in my response. Yes, Wednesday (3/4) 4-5PM will work for me. Please go ahead and send me the

invite. Goodnight

Jay

Sent via the Samsung Galaxy Note10+, an AT&T 5G Evolution capable smartphone

Get Outlook for Android

From: WEISS, MICHAEL <weiss.michael@epa.gov>
Sent: Wednesday, February 26, 2020, 3:47 PM

To: Jay Rao

Subject: RE: Follow-up to Platform Edith Inspection

Hi Jay,

Just had a meeting with Eugene and my manager Eric Magnan to figure out the best option(s) for sampling commingled Deck Drainage. We decided we would like to setup a call with Eric, Eugene, Adam, myself, you, and whoever else from DCOR that you think should participate early next week.

Are you available Tuesday 3/4 from 3-5pm or Wednesday 3/5 from 9-10 am or 4-5pm? Let me know if those times work and I will send out a meeting invite.

Thanks again,

Mike

From: Jay Rao <<u>JRao@dcorlic.com</u>>
Sent: Friday, February 21, 2020 4:32 PM
To: WEISS MICHAEL chairs michael@an

To: WEISS, MICHAEL < weiss.michael@epa.gov > **Subject:** RE: Follow-up to Platform Edith Inspection

Yes, Mike. He is one of our production engineers; and his name is Dale Bradley. His email address is dbradley@dcorllc.com.

Have a great weekend.

Jay

From: WEISS, MICHAEL < weiss.michael@epa.gov>

Sent: Friday, February 21, 2020 4:26 PM

To: Jay Rao < JRao@dcorllc.com >

Subject: RE: Follow-up to Platform Edith Inspection

Can you also send along the information for the other person who was on the call? Missed his name.

Thanks, Mike

From: WEISS, MICHAEL

Sent: Friday, February 21, 2020 4:24 PM

To: Jay Rao < JRao@dcorllc.com>

Cc: Howell, Adam < Howell. Adam@epa.gov>; bcook@dcorlic.com

Subject: Follow-up to Platform Edith Inspection

Hi Jay,

Thanks again for taking the time to discuss some of the findings from the Platform Edith inspection in September 2019 (attached). We clarified the schematic discussed in response to area of concern 2, the interpretation of commingled from the permit, the reporting and sampling of the deck drainage discharge, and the reporting of the well treatment/workover fluid discharges.

Regarding the deck drainage, it appears that it commingles with the produced water, post sampling and before being jointly discharged via tank 11. Part II.D.2, Deck Drainage Commingled

Waste Streams, of the Permit, states "If Deck Drainage is commingled with Produced Water, then effluent limitations and monitoring requirements for Deck Drainage do not apply. Effluent limitations and monitoring requirements for Produced Water apply." I will discuss this with Eugene where the best point for sampling might be and what else might need to be considered going forward.

Regarding the well treatment/workover fluid discharges, since the well treatment fluids are injected into the formations, it is difficult to estimate the exact volume of the amount that is eventually discharged (commingled with the treated produced water). I will discuss with Eugene and see what is the best way to report well treatment discharges. Let me know if you have any questions and I will reach out to you soon.

Thanks,

Mike

Michael Weiss Wastewater Section (ENF-3-1) Enforcement Division U.S. EPA Region 9 75 Hawthorne Street San Francisco, CA 94105 415.947.4570

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